IN THE UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF ALABAMA NORTHERN DIVESION

Rollie Towlseld, Plailtiff,

Vs.

CIVIL ACTION NO.: 2:06cv564-MHT

Lt. Copelaid, et al., Defeidaits.

MOTION FOR SIXTY (60) DAY CONTINUANCE PURSUANT TO RULE 6, FEDERAL RULES OF CIVIL PROCEDURE

Comes now the Plaintiff Ronnie Townsend (hereinafter Townsend) and moves this Honorable Court with his Motion for sixty (60) day continuance pursuant to Rule 6, Federal Rules of Civil Procedure and states the following in support:

- 1. On the 6th day of June, 2007 the Court issued an ORDER for Townsend to file his ojection to the Magistrate Judge's recommendation by July 6, 2007.
- 2. Townsend is not a person trained in the law and lacks the tools that extend beyond a basic education. He has to elicit the assistance of other incarcerated citizens in prosecuting this cause.
- 3. Law library access has been set up as a "pass process" in which Townsend has to submit a request for use of the institutional law library. He is then afforded only ten (10) hours per week use.
- 4. With the level of violence, lack of security and other factors associated with incarceration Townsend is subjected to institutional lock-downs which denied complete access to the law library on the days designated for his use.

- 5. The matters before this Honorable Court are very complicated and serious. The Court's decision could very well determine whether Townsend is compensated for his needless suffering and pain he has experienced and if the defendants will be allowed to continue in their contumacious conduct.
- 6. Pursuant to Rule 201(d), Alabama Rules of Evidence Townsend humbly prays the Court take judicial notice of the entire record in this cause.

WHEREFORE, for the above said reasons Townsend humbly prays the Court grant this motion.

Dated: Jule 29, 2007

Respectfully Submitted.

Rollie Towlseld 100 Warrior Lale #121142 A 27

Bessemer, Alabama 35023

CERTIFICATE OF SERVICE

I hereby certify that I have this the 29th day of June, 2007 served a copy of this Motion upon counsel for the defendants at: 301 South Ripley Street, Montgomery, Alabama 36130 pursuant to Houston v. Lack, 487 US 266 (1988) postage prepaid via United States mail.

Rollie Towlse 1d



BERRINGBARN AL SHA

OHER STREES WSTENT COVET ONATES WSTENT COVET P.O. BOX 711 HUMANGE FRONTHOUSEN, ALMANGE

Lalla Honed Hlavon III and advaluation that the Hard Hard

となるのかなのとから

Konnie Townsend 121142 - A-27-A 100 WArrior LANE Bessernes AIA 35023